

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GRANT BOYD,)	
Plaintiff)	
v.)	
)	CA05-10873 RWZ
Mike Austin, et. al.)	
Defendants)	

DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION TO MODIFY RULES

NOW COME the defendants in the above-entitled action and move this Honorable Court deny plaintiff's Motion to Modify Rules which seeks a blanket order that would allow him to depose "law enforcement personnel" prior to serving any party or nonparty with a notice of deposition pursuant to Fed.R.Civ.P 30(b), which requires a party desiring to take a deposition to serve a written notice identifying the deponent and time and location of the deposition.

Plaintiff's motion fails to identify any particular deponent(s) and would in effect deprive individuals that believe they should not be required to attend the deposition from filing motions for protective orders pursuant to Fed.R.Civ.P 30(b) once they have received notice that the plaintiff intends to depose them.

Respectfully submitted,
Plymouth County Defendants
By their Attorneys:

/s/Isabel N. Eonas

Isabel N. Eonas, Deputy General Counsel
Plymouth County Sheriff's Department
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B.B.O. #639870

DATED: October 13, 2006

CERTIFICATE OF SERVICE

I, Isabel N. Eonas, certify that on this 13th day of October, 2006 I served the within Defendants' Opposition, by mailing postage prepaid to:

Grant Boyd, pro se,
MCI-Walpole-Block 4, P.O. Box 100, S. Walpole, MA 02071.

Signed under the pains and penalties of perjury,

/s/Isabel N. Eonas
Isabel N. Eonas
Deputy General Counsel
Plymouth County Sheriff's Department